

Benjamin J. Holly
Federal Election Commission
Washington, D.C., 20463

March 25, 2010

Identification Number: C00410118
Reference: Year End Report (10/1/09-12-31-09)

Dear Mr. Holly,

This letter addresses the issues raised in the RFAI dated February 18, 2010, with response due 3/25/2010. The response will address each finding in order.

1. Identified contributions exceeding the limits set forth in the Act. These were inadvertent data entry errors caused by not looking up prior contributions before designating funds to an election. For Lynch, Patrick, an erroneous duplicate entry (10/6/2009 & 10/7/2009) was identified and deleted. Please note that in no instance did the amount identified as excess for an election cause the contributor to exceed the entire election cycle limits. We have taken the step of outsourcing caging, accounting and reporting to an experienced, professional organization to ensure these errors will not be repeated. The errors you identified have all been addressed and the excessive contributions have been returned to the contributors as described below. Per the request of Mr. Holly, copies of these checks are being sent via Federal Express to the Federal Election Commission Reports and Analysis Division:

- a. Carroad, Jeffrey: Refunded \$100
- b. Larson, Barbara: Refunded \$2,200
- c. Lynch, Patrick: Refunded \$2,400
- d. Mansour, Paul: Refunded: \$100
- e. Stai, Dian: Refunded \$100
- f. Topper, Lewis: Refunded \$100
- g. Pricewaterhouse Coopers PAC: Refunded \$1,000
- h. The Freedom and Security PAC: Refunded \$5,000

2. All of the identified incorrect values in the Election-Cycle-to-Date field have been corrected, and the correct amounts appear in the amended FEC form 3.

3. The incomplete records in the database have been identified and corrected. The missing employer/occupation information has been requested via letter to the appropriate contributors on March 11, 2010. The corrections appear in the amended FEC form 3.

4. The erroneous entries for contributions made by more than one person have been identified and corrected. Again, these were a result of inadvertent data entry errors, and steps have been taken to ensure future similar errors do not take place.

In summary, the issues identified were simply a result of data entry mistakes. We have brought in experienced assistance to ensure that our records comply with all requirements in the future.

If you have any questions, please contact me at 651-260-4648.

Sincerely,
